

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALLEN SPRADLING,

Plaintiff,

v.

SURGICAL CARE AFFILIATES, LLC, SCAI
HOLDINGS, LLC, ANDREW HAYEK,
UNITEDHEALTH GROUP, INC., UNITED
SURGICAL PARTNERS HOLDING
COMPANY, INC., UNITED SURGICAL
PARTNERS INTERNATIONAL, INC., TENET
HEALTHCARE CORPORATION, and JOHN
DOES 1-10,

Defendants.

Case No. 1:21-cv-01324-JLA

AGREED STIPULATION SETTING DEADLINES FOR DEFENDANTS TO ANSWER

Plaintiff Allen Spradling (the “Plaintiff”) and Defendants Surgical Care Affiliates, LLC, SCAI Holdings, LLC, United Health Group Incorporated, and Andrew Hayek (the “Defendants”), through counsel, stipulate to the following, subject to the Court’s approval:

1. WHEREAS, Defendants agree that service on each has been effected;
2. WHEREAS, Plaintiff filed a motion to reassign case pursuant to Local Rule 40.4 in *Roe v. Surgical Care Affiliates, LLC, et al.*, No. 1-21-cv-00305-ARW-SRH (N.D. Ill.) (the “*Roe* Action”), ECF No. 25, seeking to reassign the above-captioned action to Honorable Andrea R. Wood since the *Roe* Action is a related action to this case;
3. WHEREAS, Plaintiff Spradling joined the motion to consolidate the *Roe* Action and related actions filed by the Plaintiff in the *Roe* Action (*Roe* Action, ECF No. 39);

4. WHEREAS, a status conference was held in the *Roe* Action on March 25, 2021 at which the Court indicated that it would soon issue an order on the reassignment and consolidation motions;

5. WHEREAS, Plaintiff and Defendants (the “Parties”) propose, subject to Court approval, that this action proceed on the following schedule: Defendants will answer or otherwise respond to the Complaint no later than May 31, 2021; if the response is by motion, Plaintiff’s opposition will be due July 15, 2021; and Defendants’ reply will be due August 16, 2021;

6. WHEREAS, if this action is consolidated with another action, the deadlines provided in paragraph 5 will be stricken. Defendants will instead answer or otherwise respond no later than 45 days after the filing of a consolidated amended complaint; if the response is by motion, Plaintiff’s opposition will be due 45 days thereafter; and Defendants’ reply will be due 30 days thereafter.

7. WHEREAS, none of the Parties have previously either sought or received any extension of any deadline in this action;

8. NOW THEREFORE, the Parties through their respective counsel and subject to the Court’s approval hereby stipulate that:

- (a) The following deadlines will be set: Defendants will answer or otherwise respond to the Complaint no later than May 31, 2021; if the response is by motion, Plaintiff’s opposition will be due July 15, 2021; and Defendants’ reply will be due August 16, 2021.
- (b) In the event this action is consolidated with another matter, the deadlines in subparagraph 8(a) will be stricken and replaced with the following deadlines: Defendants will answer or otherwise respond no later than 45 days after the filing

of a consolidated amended complaint; if the response is by motion, Plaintiff's opposition will be due 45 days thereafter; and Defendants' reply will be due 30 days thereafter.

- (c) This stipulation does not constitute a waiver by the Defendants of any defense, including but not limited to those defenses provided under Federal Rule of Civil Procedure 12.

IT IS SO STIPULATED.

Dated: April 2, 2021

Respectfully submitted,

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